



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

MEMO ENDORSED

September 28, 2021

Via ECF

Honorable Barbara Moses
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 9/29/21
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Re: *Martinez v. United States of America et al.*, 20 Civ. 7275 (VEC)

Dear Judge Moses:

This Office represents the United States of America, along with individual defendants Robert Beaudouin, M.D., and Mandeep Singh, P.A. (the "Federal Defendants")¹ in the above-referenced action brought by Plaintiff Richard Martinez ("Plaintiff"). The other remaining defendants in this matter are the GEO Group, Inc., the Brooklyn Hospital Center, and Phillip McPherson, M.D.

Upon Judge Caproni's referral, Your Honor has scheduled a settlement conference for October 6, 2021. *See* Dkt. No. 93. The Federal Defendants need additional time to seek settlement authorization. Accordingly, we respectfully request that the settlement conference in this matter be adjourned by approximately 45 days, along with the concomitant deadlines in Your Honor's order scheduling the settlement conference.

We have conferred with counsel of record, and all remaining parties to this matter consent to the adjournment. The parties are available for an adjourned conference on November 16, 18, 22, or 23, 2021.²

Thank you for your consideration of this request.

¹ Judge Caproni's Opinion and Order dated September 16, 2021, dismissed the claim against one of the federal defendants named in the complaint, Yoon Kang, P.A. *See* Dkt. No. 94.

² Pursuant to Your Honor's order, Dkt. No. 93, ¶ 8, the undersigned contacted chambers before submitting this letter to determine the Court's availability.

Application GRANTED. The October 6, 2021 conference is ADJOURNED to **November 16, 2021 at 2:15 p.m.** SO ORDERED.



Barbara Moses
United States Magistrate Judge
September 29, 2021

Respectfully submitted,

AUDREY STRAUSS
United States Attorney

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cc: Counsel of record (via ECF)